

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

LC TRADEMARKS, INC., *et al.*,

Plaintiffs,

Case No. 19-cv-13782

Hon. Paul D. Borman

Mag. Judge Anthony P. Patti

v.

VICTORIOUS FOODS, LLC, *et al.*

Defendants.

**WITNESS LIST OF DEFENDANTS GEORGE OMAR KOURY  
GEORGE OMAR KOURY AS TRUSTEE FOR THE VM3G FAMILY  
TRUST, GINA RENEE KOURY, GINA RENEE KOURY AS TRUSTEE  
FOR THE VM3G FAMILY TRUST, THOMAS B. ROSHEK III, TARA  
MICHELLE DUVAL AND AFIFI KOURY, AND ERNEST KOURY AND  
SANDRA KOURY AS TO FACT WITNESSES ONLY**

Defendants George Omar Koury, George Omar Koury as Trustee for the VM3G Family Trust, Gina Renee Koury, Gina Renee Koury as Trustee for the VM3G Family Trust, Thomas B. Roshek III, Tara Michelle Duval and Afifi Koury, and Ernest Koury and Sandra Koury as to Fact Witnesses only, through their counsel, Maddin, Hauser, Roth & Heller, P.C., submit the following lists of witnesses they may call to testify at the time of trial:

1. George Omar Koury, c/o counsel.
2. Gina Renee Koury, c/o counsel.
3. Thomas B. Roshek III, c/o counsel.
4. Tara Michelle Duval, c/o counsel.
5. Afifi Koury, c/o counsel.

6. Ernest Koury.
7. Sandra Koury.
8. Matthew Goettsche, c/o counsel.
9. Danielle Goettsche, c/o counsel.
10. Gavin Dickson, c/o counsel.
11. Donald Wray, c/o counsel.
12. Ashkok Lal, c/o counsel.
13. Roxanne Bensason, c/o counsel.
14. Kevin Taylor, c/o counsel.
15. Eliza Ollinger, c/o counsel.
16. Eric Blackford, c/o counsel.
17. Paula Vissing, c/o counsel.
18. Michelle Lee, c/o counsel.
19. Darrell Snygg, c/o counsel.
20. Michael Therrian, c/o counsel.
21. Ashok Lal, c/o counsel.
22. Scott Haveman, c/o counsel.
23. Andrew J. Spring, Level 27 259 George Street, Sydney, NSW 2000  
Australia.
24. Past, present and future employees, agents, representatives and/or

record custodians of Little Caesars Enterprises, Inc., c/o counsel.

25. Past, present and future employees, agents, representatives and/or record custodians of EVO Pizza Pty, Ltd., 3 Graham Ave Casula NSW 2170 Australia.

26. Past, present and future employees, agents, representatives, members, and/or record custodians of Victorious Food, LLC., c/o counsel.

27. Past, present and future employees, agents, representatives and/or record custodians of LC Trademarks, Inc., c/o counsel.

28. Past, present and future employees, agents, representatives and/or record custodians of Blueline Foodservice Distribution, Inc., c/o counsel.

29. Past, present and future employees, agents, representatives and/or record custodians of Bitwealth Holding, Inc., c/o counsel.

30. Experts to be named in the areas of forensic accounting, business start-ups, and franchise management.

Defendants reserve the right to identify other individuals as discovery proceeds and as other individuals are identified.

Respectfully Submitted,

/s/ John A. MacKenzie

John A. MacKenzie (P80386)

Maddin, Hauser, Roth & Heller, P.C.

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*Attorneys for Defendants George Omar Koury,  
George Omar Koury as Trustee for the VM3G  
Family Trust, Gina Renee Koury, Gina Renee Koury  
as Trustee for the VM3G Family Trust, Thomas B.  
Roshek III, Tara Michelle Duval and Afifi Koury*

Dated: December 9, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on **December 9, 2020**, I electronically filed and served the above document and this Certificate of Service with the Clerk of the Court using the MiFile True Filing File & Serve E-Filing system, which will send notification of such filing to those who are currently on the list to receive e-mail notices for this case.

MADDIN HAUSER ROTH & HELLER, P.C.

By: /s/ Sarah E. Morris  
Sarah E. Morris